

FCC 01-289

Dear Sirs

I am a General Aviation pilot and FAA flight instructor and I see that you are proposing to ban the use in aircraft of 121.5MHz Emergency Locator Transmitters. I can see no good reason why anyone would want to make this safety aid illegal and force thousands of aircraft owners to install the 406MHz system that would cost \$1000 to \$3000 per aircraft. In many cases this would easily be 10% and more of the value of the aircraft.

I can see that this mandated change would be in the interests of some vested interests such as:

- the manufacturers of the 406MHz systems that we would only use for a few years before the FAA mandates we switch to ADS-B.

- and some government officials whose careers have been built on the switch from 121.5 to 406

Considerable resources exist to assist downed pilots utilizing the 121.5 system. Air carriers and ATC facilities are required to listen out on this frequency. The Civil Air Patrol is equipped with 121.5 receivers. Most GA aircraft have radios that can operate on this proven traditional international emergency channel. Why would you want to unnecessarily obsolete these resources and in doing so inevitably cause lives to be lost?

There is no evidence I am aware of that the 406 system will be any better assisting pilots in distress than 121.5. Both systems suffer a significant weakness in that the ELT has to survive the crash and then operate. If the 406 survives yes it will give a more accurate location but it is a big "if" not borne out in practice. The track record is poor but better than nothing. Changing frequencies will make no difference to this operating issue.

ADS-B will be very expensive and it is by no means certain that it will assist the GA pilot despite high costs that are unnecessary and inappropriate especially for the low cost end of the GA fleet.

There are satellite tracking systems such as SPOT and Spidertracks available at much lower cost that operate superbly and allow friends and family to track a flight and know precisely where the last airborne position was. This technology was not invented in government circles which is maybe why it is ignored but it gives a downed pilot a much better chance to be recovered by nightfall and thus survive than the officially sponsored systems. The search radius is much smaller and thus much cheaper than random hunting for an ELT signal whether by air or ground, whether private or official resources.

If you must go against common sense and ban 121.5 systems please wait till ADS-B is fully deployed.

Thank you for your consideration, John Hodgson